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10
11 Attorneys for Defendant VALVE
CORPORATION

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
14

15 A.M.,

16 Plaintiff,

17 v.

18 VALVE CORPORATION and DOES 1
19 through 10, inclusive,

20 Defendants.

Case No. 2:16-CV-03595

[Superior Court of the State of
California, County of Los Angeles Case
No. BC616766]

**DECLARATION OF SCOTT
LYNCH IN SUPPORT OF
DEFENDANT VALVE
CORPORATION'S NOTICE OF
REMOVAL TO FEDERAL COURT
UNDER 28 U.S.C. § 1441 (28 U.S.C. §
1332 - DIVERSITY)**

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23 I, Scott Lynch, declare:

24 1. I am the Chief Operating Officer for Defendant Valve Corporation. I
25 have personal knowledge of the following facts and, if called as a witness, could and
26 would testify competently thereto.

27 2. As the Chief Operating Officer of Valve, I am broadly responsible for
28 managing all aspects of the company's business. This includes our office in

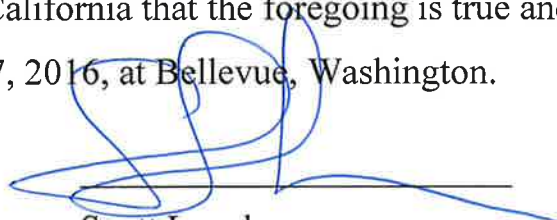
1 Bellevue, Washington, as well as the few employees and independent contractors
2 that work outside of that office.

3 3. Valve was incorporated in Washington in 2003, and was previously a
4 limited liability company also based in Washington. Because I have worked for
5 Valve for more than 16 years, I am familiar with both entities.

6 4. Ever since its incorporation in 2003, Valve's corporate headquarters
7 has been in Bellevue, Washington. Valve's business includes software and
8 hardware development, and this work has been performed almost exclusively in
9 Bellevue. Valve employs approximately 325 employees in Washington, and no
10 employees in other states. All of Valve's executive and administrative functions are
11 performed at its corporate headquarters in Bellevue, Washington. All of Valve's
12 corporate officers and executives are located in Washington. Valve currently does
13 not have any employees in California.

14 I declare under penalty of perjury under the laws of the United States of
15 America and the State of California that the foregoing is true and correct.

16 Executed on May 17, 2016, at Bellevue, Washington.

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19 Scott Lynch
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